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2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE DISTRICT OF MARYLAND**

4 MARYLAND SHALL ISSUE, INC., *et al.*,)
5 *Plaintiffs,*)
6 v.) Case No. 8:21-cv-01736-TDC (L)
7 MONTGOMERY COUNTY, MD.,) Case No. 8:22-cv-01967-DLB
8 *Defendant.*)
9)

10 **DECLARATION OF JOHN DOE NO.1**

11 COMES NOW, the declarant, JOHN DOE NO.1, and hereby solemnly declares
12 under penalties of perjury and states that based upon personal knowledge that the contents of the
13 following declaration are true:
14

15 1. My name is JOHN DOE NO.1, and I am member of Maryland Shall Issue, Inc.,
16 a plaintiff in the above-captioned matter. I am an adult over the age of 18, a Montgomery County
17 Maryland resident and I am fully competent to give sworn testimony in this matter. JOHN DOE
18 NO. 1 is not my real name. I respectfully request that my identity remain anonymous. While I
19 provide armed security to my synagogue, I have done so anonymously and the effectiveness of
20 that security would be undermined if my role in doing so became public knowledge. Moreover,
21 regretfully, I am concerned that my livelihood would be jeopardized should I be publicly
22 associated with pro-Second Amendment advocacy.
23

24 2. I am an Orthodox Jew with a background in both armed and unarmed self-
25 defense. I serve (anonymously) as a volunteer plain-clothed armed security member of an
26 Orthodox synagogue located in Montgomery County Maryland at the request of the synagogue's
27 Board and Rabbi ("leadership").
28

EXHIBIT P

1 3. At the request of the synagogue leadership, I initially applied for and received a
2 restricted Maryland Wear and Carry Permit allowing me to be armed to, from and in the synagogue.
3 Since then, I have been approved for and hold an unrestricted Maryland Wear and Carry Permit.
4

5 4. When I was originally asked to act in an armed security role, the synagogue's
6 leadership were very concerned for the safety, welfare and security of our congregants. During the
7 prior year, a Rabbi in Florida was murdered going to synagogue. Terrorists had attacked and killed
8 all the members of the Mumbai (Bombay) Chabad Synagogue in India. Serious armed attacks
9 against Jewish institutions in the U.S. had occurred in Los Angeles, Washington D.C., New York,
10 Baltimore, and many other cities. Many congregants were killed at a synagogue in Har Nof
11 Jerusalem; four people were executed at the Hyper Cacher market (Kosher Supermarket) in Paris;
12 a congregant was killed outside the synagogue in Copenhagen, a child and son of the Chabad Rabbi
13 were attacked in New Zealand.
14

15 5. More recently there were the tragic attacks on the Tree of Life Synagogue in
16 Pittsburgh, Pennsylvania and the Poway Chabad Synagogue in California, that left many innocent
17 congregants dead. There are nearly daily assaults on Jews in New York and across the country.
18

19 6. In the very recent past and very nearby, there has been vile anti-Semitic graffiti
20 spray-painted on the fence at the entrance of the Bethesda Trolley Trail that included the images
21 of three hanging bodies and the words, "no mercy for jews." I understand that this was the second
22 such incident at this location this year. In fact, our synagogue has been defaced with anti-Semitic
23 graffiti.
24

25 7. Even closer to home the avowed Neo-Nazi, who lives very close to our
26 synagogue and who openly wears a shirt displaying a large swastika, has verbally accosted some
27 of our synagogue members (these incidents have been reported to the police). While walking to
28

1 and from synagogue, I have been taunted and verbally accosted by passing motorists who have
2 spit at me, called me "dirty Jew" and thrown loose change at me.

3
4 8. While our synagogue has a strong cooperative relationship with our local
5 Montgomery County Police and the Maryland State Police, we are small and cannot afford to hire
6 either off-duty Police Officers or other security services on a full-time basis. We also know the
7 police are spread thin and a terrorist can inflict a great deal of harm before police could arrive at
8 our location. In our congregation, small prayer groups meet early in the morning as well as in the
9 late evening each day and are particularly vulnerable at these times. Because I am a long-time
10 member of our congregation that regularly attends daily (both morning and evening), I know
11 everyone who may be expected to visit, and who may require enhanced scrutiny, and I am well-
12 situated to respond to a threat, should one G-d forbid, occur.

13
14 9. By its text, Bill 21-22E has banned the possession and transport of firearms at
15 and within 100 yards of a "house of worship." That ban has stripped Jewish synagogues in the
16 County of the armed protection provided by members of their congregations like me, thus leaving
17 these places of worship vulnerable to attack. The urgency and need for such protection cannot be
18 overstated.

19
20 10. I hereby declare that the factual allegations in the complaint that relate or refer
21 to myself are true.

22 /s/ John Doe No. 1

23 Dated this day of November 30, 2022:
24 JOHN DOE NO.1
25
26
27
28